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2025-2-05

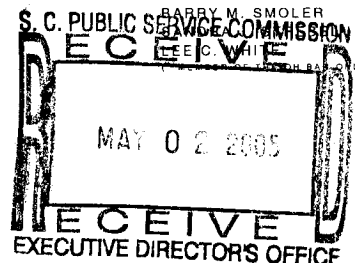
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April 25, 2005

Mr. Charles Terreni
Chief Clerk of the Commission
SC Public Service Commission
P.O. Drawer 11649
Columbia, SC 29211

Re: Annual Review of the Purchased Gas Adjustments & Purchasing
Policies for South Carolina Pipeline Corporation
Docket No. 2005-6-G

Dear Mr. Terreni:

Enclosed please find for filing a copy of the Interrogatories and Information Data Requests of the City of Orangeburg, South Carolina in the above-captioned matter, which is being served on counsel for the Applicant.

JH I have enclosed an extra copy of the Interrogatories and Information Data Requests, which I would ask you to date stamp and return to me in the enclosed stamped self-addressed envelope. If you have any questions, please feel free to contact me.

Very truly yours,

J. N. Horwood
James N. Horwood

JNH/cll
Enclosures

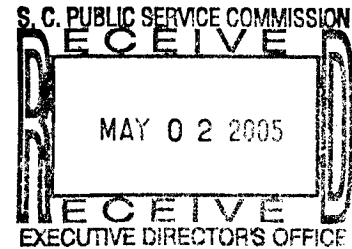
cc: K. Chad Burgess, Esq.
Scott Elliott, Esq.
Wendy B. Cartledge, Esq.

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2005-6-G**

IN RE:

**South Carolina Pipeline Corporation
Annual Review of the Purchased Gas
Adjustments and Gas Purchasing
Policies**

**INTERROGATORIES AND
INFORMATION DATA REQUESTS
SET NO. 1**



**TO: K. CHAD BURGESS, ATTORNEY FOR
SOUTH CAROLINA PIPELINE CORPORATION**

On October 5, 1987 the Public Service Commission of South Carolina issued its Order No. 87-1122 which requires the annual review of the Purchased Gas Adjustment and the Gas Purchasing Policies of South Carolina Pipeline Corporation.

Pursuant to 26 S.C. Code Regs. 103-851 and 854 (Supp. 2003), the City of Orangeburg, South Carolina hereby serves the following Interrogatories and Data Requests upon South Carolina Pipeline Corporation.

DEFINITIONS AND INSTRUCTIONS

1. Definitions

As used herein, the following terms have the meanings indicated:

- (a) "SCPC" refers to South Carolina Pipeline Corporation.
- (b) "Document" shall include, without limitation, all writings and records of every type in SCPC's possession, control, or custody, whether or not the original is within SCPC's control, custody or possession, including, but not limited to, the following items, whether printed or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: notes; letters; correspondence; communications; telegrams; e-mail messages; memoranda; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets; workpapers; charts; plants; maps; drawings; engineering and other diagrams

(including "one-line" diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audit and video recordings; computer data files, tapes, inputs; outputs, and printouts; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of corporate and other meetings; records of corporate and other meetings; transcripts; stenographic records; testimony and exhibits, including workpapers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of negotiations; press releases; newspaper clippings; drafts and revisions of drafts of documents; and any and all other records, written, electrical, mechanical, and otherwise. "Documents" also means every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or appendices to any documents.

2. **Instructions for Responding**

- (a) Please send Orangeburg three (3) copies of your responses, one to each of the following addresses:

James N. Horwood, Esq.
Pablo O. Nüesch, Esq.
Spiegel & McDiarmid
Suite 1100
1350 New York Avenue, N.W.
Washington, D.C. 20005-4798

Mr. Larry Loos
Mr. Thomas Sullivan
Black & Veatch Corporation
P.O. Box 8405
8400 Ward Parkway
Kansas City, MO 64114

Mr. Tommy Miller
Director, Gas Division
Department of Public Utilities
P.O. Box 1057
Orangeburg, SC 29116-1057

- (b) All answers to these requests and interrogatories should be submitted separately and fully in writing. Each answer to a particular request or interrogatory should specify its author.
- (c) Where a request or interrogatory has a number of separate subparts or related parts or portions, a complete response is required to each such subpart or portion.
- (d) If an interrogatory specifically requests an answer in response rather than the reproduction of documents, an answer is required. The production of documents will not suffice.
- (e) If the information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the request or interrogatory.

- (f) Each response should be furnished on a separate page headed by the individual request or interrogatory being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
- (g) For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including program description, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
- (h) If a request or interrogatory cannot be answered in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, and state why the answer cannot be made fully.
- (i) If no document is responsive to a request which calls for a document, then so state. In each such instance, the request should be treated as an interrogatory.
- (j) If any request or interrogatory, or instruction applicable thereto, appears to be unclear or ambiguous, please contact one of the persons listed below to obtain an explanation or clarification:

James N. Horwood, Esq.
Pablo O. Nüesch, Esq.
Spiegel & McDiarmid
Suite 1100
1350 New York Avenue, N.W.
Washington, D.C. 20005-4798
(202) 879-4000

INTERROGATORIES AND INFORMATION DATA REQUESTS

1. Please provide the demand and commodity charges SCPC billed each category of firm sales customer each month for the period January 2003 through December 2004, their billing determinants and the resulting revenues.
2. Please provide the commodity charges SCPC billed each category of interruptible sales customers each month for the period January 2003 through December 2004, their billing determinants and the resulting revenues.
3. Please provide SCPC's WACOG each month for the period January 2003 through December 2004 and all the calculations underlying its development.
4. Please provide the following information on SCPC's purchases of gas supply each month January 2003 through December 2004:
 - a. Quantity and average price of gas supply purchased under one month contracts.
 - b. Quantity and average price of gas supply purchased under multi-month contracts, by contract.
 - c. Quantity and average price of gas supply purchased under contracts of less than one month.
5. Please provide the following information on the costs SCPC incurred to perform its gas acquisition or "merchant function" for calendar years 2003 and 2004:
 - a. Names and positions of SCPC personnel responsible for gas acquisition or "merchant function", including planning, procurement and accounting.
 - b. Percentage of annual time of SCPC personnel allocated or attributable to gas acquisition or "merchant function."
 - c. Aggregate direct costs (salary and benefits) of SCPC personnel allocated or attributable to gas acquisition or "merchant function".
 - d. Indirect or overhead costs allocated or attributable to gas acquisition.
 - e. Other costs allocated or attributable to gas acquisition or "merchant function."
6. Please provide all analyses performed by SCANA or SCPC showing costs, potential cost savings, or potential additional costs of performing "merchant function" versus providing only transportation and LNG service such as proposed in SCPC's open access filing.
7. Referring to Request 5a., Please provide a similar list of names and positions of SCPC personnel who will perform the comparable functions under SCPC's proposed open access.
8. Please provide the following information on costs associated with SCPC's hedging program each month during the period January 2003 through December 2004:
 - a. Consultant fees.

- b. Consultant commissions.
 - c. Software fees.
 - d. Subscription and data feeds.
 - e. Trading gains/losses.
 - f. Names and positions of SCPC personnel responsible for program.
 - g. Percentage of annual time of each SCPC staff person spent on program.
 - h. Aggregate direct costs (salary and benefits) of SCPC personnel responsible for program.
 - i. Other costs (please identify).
9. Please provide the quantity and average price of gas hedged by type of financial instrument and by future month for each month during the period January 2003 through December 2004.
10. Is it SCPC's position that its hedging program protected rate payers against unacceptable variations in gas costs in 2003 and 2004? If yes, please provide all analyses and facts supporting this position. If no, please explain why not.
11. What were SCPC's goals associated with its hedging program during 2003 and 2004? For each goal, did SCPC meet it? Please explain fully.
12. Please describe all major changes in the operation of SCPC's hedging program during 2003 and 2004, and a reason for those changes.
13. Please provide all work papers showing the derivation of the price risk adjustment for each month of the period January 2003 through December 2004.
14. Please provide copies of all correspondence submitted to the Public Service Commission or PSC Staff during 2003 and 2004 regarding SCPC's hedging program.
15. Please provide copies of all correspondence, memorandums, bill inserts, etc. provided by SCPC to its sale-for-resale customers during 2003 and 2004 regarding SCPC's hedging program.
16. Please provide a copy of all policies and procedures governing SCPC's hedging program.
17. Please explain how each of these policies and procedures was implemented during 2003 and 2004.
18. Please provide the following information regarding the service SCPC provided each month during the period January 2004 through December 2005:
- a. MDQ and quantity of firm sales service to sale-for-resale customers.
 - b. MDQ and quantity of firm sales service to industrial and other retail customers.
 - c. Quantity of sales service to interruptible industrial and other retail customers.
 - d. MDQ and quantity of firm transportation service to resale customers.
 - e. MDQ and quantity of firm transportation service to industrial and other retail customer.
 - f. Quantity of interruptible transportation service to industrial and other retail customers.

19. Please provide the following information regarding the annual revenues SCPC collected for its services each month during the period January 2003 through December 2004:
 - a. Firm sales service to sale-for-resale customers.
 - b. Firm sales service to industrial and other retail customers.
 - c. Sales service to interruptible industrial and other retail customers.
 - d. Firm transportation service to resale customers.
 - e. Firm transportation service to industrial and other retail customers.
 - f. Interruptible transportation service to industrial and other retail customers.
20. Please provide the following information regarding each curtailment of deliveries to interruptible sales and interruptible transportation service customers during the period January 2003 through December 2004:
 - a. Starting date of curtailment.
 - b. Volume curtailed.
 - c. Number of days that volume was curtailed.
21. Please provide the quantity of gas sent out from each peak shaving facility in SCPC's system each day in each month during the period January 2003 through December 2004.
22. Please provide the following information regarding capacity SCPC released on Southern for each month during the period January 2003 through December 2004:
 - a. Quantity posted for release on a non-recallable basis.
 - b. Quantity posted for release on a recallable basis and terms of recall.
 - c. Quantity actually released on a non-recallable basis.
 - d. Quantity actually released on a recallable basis.
 - e. Revenues from releases on a non-recallable basis.
 - f. Revenues from releases on a recallable basis.
23. Please provide the following information regarding capacity SCPC released on Transco for each month during the period January 2003 through December 2004:
 - a. Quantity posted for release on a non-recallable basis.
 - b. Quantity posted for release on a recallable basis and terms of recall.
 - c. Quantity actually released on a non-recallable basis.
 - d. Quantity actually released on a recallable basis.
 - e. Revenues from releases on a non-recallable basis.
 - f. Revenues from releases on a recallable basis.
24. Please provide the following information regarding capacity SCPC released to any affiliate during 2003 and 2004:
 - a. Month.

- b. Pipeline.
 - c. Quantity released on a non-recallable basis.
 - d. Quantity released on a recallable basis.
 - e. Revenues from releases on a non-recallable basis.
 - f. Revenues from releases on a recallable basis.
25. With regard to SCPC's ISP-R program and customers, please provide the following for each month of the period January 2003 through December 2004:
- a. Total volumes delivered.
 - b. Total revenues.
 - c. Average cost of gas delivered.
 - d. All workpapers showing the development of volumes, revenues, and cost of gas.
26. For each month during the period January 2003 through December 2004, please provide the volumes delivered through the ISP-R program that were hedged and the price at which they were hedged.
27. In documents provided on the SCG website, SCPC is proposing a 0.95 percent loss factor for Carolina Pipeline, please provide a copy of all workpapers, analyses, studies, and any other document that were used to develop this loss factor.
28. Please provide a copy of all workpapers, analyses, studies, and any other documentation that supports the current 2 percent loss factor used on SCPC.
29. Please provide the following information with regards to service provided by SCPC to each SCPC affiliate company for each month of the period January 2003 through December 2004:
- a. Contract Demand.
 - b. Volume of gas sold.
 - c. Volume of gas transported.
 - d. Demand charge.
 - e. Commodity charge.
 - f. Transportation charge.
 - g. Revenues.
30. Have any assets of SCPC been transferred or sold to any company affiliated with SCPC? If so, please provide the following:
- a. Name of affiliate.
 - b. Nature and detailed description of the asset(s).
 - c. Cost or price basis on which transfer price was based.
 - d. Original cost or book cost of asset(s).
 - e. Price realized for asset(s).
31. Please provide all responses to all other data requests submitted in this proceeding.

32. Please provide a copy of all information filed by SCPC in connection with this matter including but not limited to exhibits, testimony, and workpapers.

A handwritten signature in black ink, appearing to read "J. N. Horwood", is positioned above the printed name.

James N. Horwood

Pablo O. Nüesch (S.C. Bar No. 13575)

Spiegel & McDiarmid

1333 New Hampshire Avenue, N.W.

Washington, DC 20036

Telephone: (202) 879-4000

Attorneys for the Department of Public Utilities
of the City of Orangeburg, South Carolina

April 25, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing document to be served on the parties listed below by depositing a copy of same in the United States Mail, first class postage prepaid:

REPRESENTATIVE

K. Chad Burgess
Willoughby & Hoefer, P.A.
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Columbia, SC 29202

C. Dukes Scott
Wendy B. Cartledge
P.O. Box 11263
Columbia, SC 29211

Scott Elliott
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

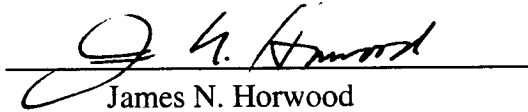
ENTITY REPRESENTED

South Carolina Pipeline Corporation

Office of Regulatory Staff

South Carolina Energy Users Committee

Dated this 25th day of April, 2005, at Washington, D.C.


James N. Horwood